

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

BENNETT MARCUS, STEVE KENNEDY, and
ISAAC KEIL, individually and on behalf of other
persons similarly situated who were employed by
AXA ADVISORS, LLC, AXA FINANCIAL
SERVICES, LLC, and AXA NETWORK, LLC
and/or any other entities affiliated with or controlled
by AXA ADVISORS, LLC and AXA NETWORK,
LLC,

Plaintiffs,

- against -

AXA ADVISORS, LLC, AXA FINANCIAL
SERVICES, LLC, and AXA NETWORK, LLC
and/or any other entities affiliated or controlled by
AXA ADVISORS, LLC, AXA FINANCIAL
SERVICES, LLC, and AXA NETWORK, LLC,

Defendants.

Case No. 11-CV-2339 (SMG)

NOTICE OF MOTION

PLEASE TAKE NOTICE that upon the annexed Memorandum of Law, the Declaration of Lloyd Ambinder, and the annexed exhibits, the undersigned will move this Court before United States Chief Magistrate Judge Steven M. Gold, at the United States Courthouse for the Eastern District of New York, located at 225 Cadman Plaza East, Brooklyn, New York, 11201, on May 6, 2016, for an order (1) granting final approval of the settlement; (2) binding all Rule 23 Class Members who have not timely opted out to the Released Claims as set forth in the Settlement Agreement, and (3) dismissing this action with prejudice.

Dated: New York, New York
April 26, 2016

VIRGINIA & AMBINDER, LLP

By: _____/s/_____
Lloyd Ambinder, Esq.
James Emmet Murphy, Esq.
Kara Miller, Esq.
40 Broad Street, 7th Floor
New York, New York 10004
Tel: (212) 943-9080
Fax: (212) 943-9082

and

LEEDS BROWN LAW, P.C.
Jeffrey K. Brown, Esq.
Michael Tompkins, Esq.
One Old Country Road, Suite 347
Carle Place, NY 11514
Tel: (516) 873-9550
Fax: (516) 747-5024

Attorneys for Plaintiffs and the Settlement Class